

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

THOMAS C. GOLDSTEIN,

Defendant.

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CRIMINAL NO. LKG-25-6

**DEFENDANT THOMAS C. GOLDSTEIN’S CONSENT MOTION TO MODIFY
CONDITIONS OF RELEASE TO PERMIT TRAVEL**

Defendant Thomas C. Goldstein respectfully requests that the Court modify his conditions of release to allow him to attend his child’s high school graduation in the United Kingdom subject to conditions recommended by Pretrial Services. In accordance with the conditions of Mr. Goldstein’s pretrial release, Pretrial Services has approved Mr. Goldstein’s proposed travel. *See* ECF No. 6, ¶ 8(j) (permitting travel outside of the Washington, D.C. metropolitan area with “prior Pretrial approval”). Mr. Goldstein requests that the Court permit the release of his passport to allow Mr. Goldstein to attend the graduation ceremony.

The Justice Department does not object to the proposed travel pursuant to the release conditions outlined by Pretrial Services. Those conditions are:

1. Mr. Goldstein will travel to Oxford, England for the purpose of attending his child’s high school graduation from May 26, 2025 to May 29, 2025.
2. Mr. Goldstein will provide Pretrial Services with a detailed itinerary that includes flight and hotel information prior to his departure.

3. While traveling internationally, Mr. Goldstein will be subject to the third-party custody of his wife throughout the entirety of his trip.
4. While traveling internationally, Mr. Goldstein will submit to daily check-in calls (via FaceTime) with Pretrial Services in the presence of his third-party custodian. A time for the daily calls will be arranged between Mr. Goldstein, his wife, and Pretrial Services.
5. Mr. Goldstein will surrender his U.S. passport to the Court upon his return, no later than May 30, 2025, at 2:00 pm.
6. The third-party custodian obligation will be complete once Mr. Goldstein has returned to the United States and surrendered his U.S. passport.

Mr. Goldstein is fully compliant with his current release conditions. In light of Pretrial Service's consent and the Justice Department's lack of objection, the defense respectfully requests that the Court issued the attached proposed order modifying Mr. Goldstein's conditions of release to permit him access to his passport for the purpose of traveling to Oxford, England to attend his child's high school graduation.

Respectfully submitted,

/s/ Jonathan I. Kravis

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Dated: May 9, 2025